

From: Ronnie Cummins [ronnie@organicconsumers.org]
Sent: Tuesday, April 22, 2003 9:08 AM
To: Benham, Katherine
Subject: Request to speak at NOSB Meeting May 13 in Austin TX

Dear Katherine Benham and NOSB,

My name is Ronnie Cummins and I'm the National Director of the Organic Consumers Association <www.organicconsumers.org> a nationwide network of 500,000 organic consumers, dedicated to promoting socially and environmentally responsible consumer awareness and practices and to transforming American agriculture to a system of organic and sustainable farming.

We are very concerned that the NOSB and the USDA NOP adopt strict standards for body care products certified and labeled as "organic" (i.e. standards that basically mirror NOP standards for food products) and that companies currently selling so-called "organic" body care products with misleading labels stop doing so.

I request to be able to speak to the NOSB at Austin, TX on May 13 to address these issues.

I have pasted in below as well as attached an article from the current issue of Organic View, a newsletter of the Organic Consumers Association, which represents the views of the OCA on the need for preserving strict organic standards on body care products labeled as organic.

I look forward to hearing back from you.

Regards,

Ronnie Cummins, National Director, Organic Consumers Association

OCA ADDRESSES ORGANIC STANDARDS IN BODY CARE PRODUCTS

The Organic Consumers Association recently launched a new campaign to establish strict standards for body care products labeled as organic.

Scientists and medical practitioners warn of the impact of what is absorbed through the skin--whether it's soap, shampoo, cosmetics, suntan oil, or lotions for babies and children.

This process of direct absorption through the skin and capillaries into the body is particularly dangerous, because it completely bypasses the kidneys and liver, which would normally filter out toxins. The ability of skin to serve as a direct and unfiltered "gateway" into the bloodstream is exactly why nicotine patches and other medicinal surfactants are so effective. This is the one of the main reasons we are starting to see "organic" labels on many so-called natural body care products.

But, as the OCA has learned, many of the leading brand name products in the body care and cosmetics marketplace currently labeled "organic" are composed mostly of "organic" perfumed water, often containing as little as 5% organic ingredients other than these waters. In addition, a number of these products contain petroleum-based ingredients which can contain trace toxic contaminants.

Compounding the problem, various companies and interests in the natural products industry are pressuring a task force of the Organic Trade Association (OTA) to formulate proposed federal organic standards for body care products that could seriously undermine the integrity of the organic label. These compromised standards, if enacted, would allow companies across the country to label a product whose core ingredients are conventional synthetic cleansers, conditioners, and preservatives found in main-stream products, as "organic", by simply adding "organic" perfumed water. If this "organic water" is 70% of the content, the product could then legally be labeled 70% organic.

In response to this outrage, OCA launched its "Coming Clean" campaign at the Natural Products Expo West in Anaheim, CA in March, 2003. The OCA believes that the only real solution to this problem involves public education, marketplace pressure, and network building--as well as possible litigation and legislative action. Either we must convince the Organic Trade Association (OTA) and the US Department of Agriculture National Organic Program (NOP) to not give in to pressure from "natural" companies attempts to water down organic standards, as applied to body care products, or the organic community will have to develop and popularize an appropriate third-party certified "Eco-Label" which meets up to the traditional standards of organic integrity.

We must begin to educate ourselves to identify and avoid problematic and potentially hazardous products and ingredients that are already sold in the marketplace. We should also make sure that Fair Trade practices, validated by third-party certification (either organic or Fair Trade certifiers) permeate the entire chain of production and marketing of body care products labeled as organic. For further information on OCA's Coming Clean campaign see our website. If you would like to get involved in the Coming Clean campaign please contact the OCA national office.

THE PROBLEM:

A number of body care product companies are counting non-agricultural water as organic to green-wash their products and make organic label claims, even though their formulations are in fact largely composed of the same conventional synthetic cleansers, conditioners and preservatives found in mainstream products. This fraud is destroying the integrity and strength of the organic program.

Floral waters (or hydrosols) are the water by-product of essential oil steam distillation, and are basically a complicated way of making tea. Various companies that make body care products based on synthetic surfactants front-load their ingredients? list with floral waters and water extracts/infusions.

They do this to minimize the impact of the names of the synthetic surfactants that actually make up the product, which are buried many ingredients down the list. A recent variation of this tactic among certain body care companies is to use ?organic? floral waters and water extracts.

These are hollowly claimed to be key functional organic component(s) of the product, but are in fact inconsequential and insignificant. The actual core ingredients in these products are often one or more of the following:

Olefin Sulfonate is a completely petroleum derived surfactant that has no place in an organic product.

Cocoamidopropyl Betaine uses a petroleum intermediate in building the surfactant.

Ethoxylated surfactants like Sodium Myreth Sulfate use petroleum derived ethylene oxide to ethoxylate alcohol sulfates which can produce 1,4 dioxin, a toxic material, in trace quantities.

The Paraben preservatives utilized extensively are also manufactured from petroleum-derived materials.

THE SOLUTION:

Body care ingredients and products should only be considered organic if: Certified organic agricultural feed-stocks are utilized exclusively, versus petroleum or conventional vegetable feed-stocks, in the manufacture of the key ingredients.

Manufacture of such ingredients is reasonably simple and ecological.

The toxicity of each ingredient is minimal.

Non-agricultural water is not counted in any form as contributing to organic content. Agricultural water is the naturally occurring water in a plant.

Even though organic floral water/hydrosol is over 99% non-agricultural water, this water is counted "organic" by some body care companies to drastically inflate the weight of organic ingredients to make the claim that they use "70% Certified Organic Ingredients." However, the fundamental criteria of the organic regulations is that only the non-water weight of a product is counted when determining organic content, and these products are mostly synthetic and non-organic ingredients mixed with flavored water. A soup company cannot replace their regular water in a conventional vegetable soup product with "organic rosemary water" and then claim the soup is "70% Organic" without organically sourcing any of the actual real vegetable ingredients.
